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UNITED STATES BANKRUPTCY COURT
DISTRICT OF MONTANA

In re

SCOTT K. WILLIAMS,

Debtor.

Case No. 9:23-bk-90147-BPH

RICHARD J. SAMSON,

Plaintiff,

v.

Adversary No. 9:23-ap-09001-BPH

CANDY WILLIAMS and
VIKING INVESTMENTS LLC,

Defendant.

DECLARATION OF CANDY WILLIAMS

I, Candy Williams, declare under penalty of perjury under the laws of the United States as follows:

1. I am a defendant in this adversary proceeding. I am the sole member of Viking Investments, LLC. I am married to the Debtor in this bankruptcy case, Scott K. Williams. Scott



and I reside in the Bigfork, Montana area.

2. I organized Viking Investments, LLC, in July, 2019. At the time Scott and I were contemplating moving from Utah to Montana, I am from Montana, and at the time I was looking into going into business operating a coffee shop. Scott was also contemplating acquiring a service station. Although I did not start a coffee shop and Scott looked at but decided not to buy a service station, I was considering other options for investments in Montana, including acquiring real property to sell later or rentals.

3. In August, 2019, Scott transferred \$400,000 into Viking Investments. At the time it was our intention to use the money for investment purposes. Viking acquired a house in September, 2019, for \$358,000 and it was our plan to fix it up and sell it by the end of 2019. There were substantial problems with the house and ultimately it was necessary to borrow money to fix it up. In order to borrow the funds the house was transferred into my name in late December, 2019.

4. At the time of the transfer of funds into Viking, the funds were recognized by me as being Scott's money. Some of the funds were paid back to Scott and other funds were used to pay on debts for which he was liable. That continued with funds that were borrowed against the house. Attached hereto as exhibit A are tables I prepared in response to Interrogatories served in this case showing the payment of funds to or for Scott's benefit and also spent on rehabilitating the house.

5. Scott has not been employed since 2019 and at this time his income is from Social Security. I work for a mortgage company handling its payroll and I am the primary source of income for our household and consequently pay most of the household expenses. I was able to move from Utah to Montana and continue working in my job remotely, and we moved into the

house in May, 2020. Scott and I have resided there since that time.

6. I am aware of the claims being made by Kent Williams over Scott's handling of the Hugh L. Williams Family Trust. There was a forensic accounting done in connection with that dispute that was not submitted to the Court in connection with this controversy and it is my understanding that it does not support Kent William's claims.

Dated: _____

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that I served the foregoing Brief in Opposition to Motion for Summary Judgment on November 3, 2023, on the following persons in the manner indicated:

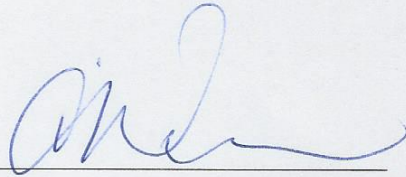
Trent Gardner
Via ECF

/s/Edward A. Murphy

house in May, 2020. Scott and I have resided there since that time.

6. I am aware of the claims being made by Kent Williams over Scott's handling of the Hugh L. Williams Family Trust. There was a forensic accounting done in connection with that dispute that was not submitted to the Court in connection with this controversy and it is my understanding that it does not support Kent William's claims.

Dated: 11-3-23



CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that I served the foregoing Brief in Opposition to Motion for Summary Judgment on November 3, 2023, on the following persons in the manner indicated:

Trent Gardner
Via ECF

/s/Edward A. Murphy

GBV= Glacier Bank- Viking

AF= America First

GB= Glacier Bank- personal account

	Credit Card payments		
10/15/2019	Amex	\$ 6,147.17	GBV
11/14/2019	Amex	\$ 649.01	GBV
12/2/2019	Amex	\$ 8,781.59	GBV
1/13/2020	Amex	\$ 2,448.29	AF
3/13/2020	Amex	\$ 23,276.87	AF
4/14/2020	Amex	\$ 1,177.82	AF
6/14/2020	Amex	\$ 6,918.39	GB
7/14/2020	Amex	\$ 9,966.67	AF
8/14/2020	Amex	\$ 5,831.91	AF
9/14/2020	Amex	\$ 8,408.30	AF
10/14/2020	Amex	\$ 3,014.56	AF
11/16/2020	Amex	\$ 3,569.04	AF
11/16/2020	RC Willey	\$ 197.00	
1/14/2021	Amex	\$ 2,814.78	AF
3/15/2021	Amex	\$ 1,000.00	AF
4/14/2021	Amex	\$ 3,289.53	GB
12/15/2020	RC Willey	\$ 212.00	GB
1/8/2021	RC Willey	\$ 212.00	GB
2/18/2021	RC Willey	\$ 212.00	GB
3/16/2021	RC Willey	\$ 212.00	
4/1/2021	CC	\$ 63.45	
4/1/2021	CC	\$ 53.80	
4/1/2021	Amex	\$ 3,289.53	GB
4/15/2021	RC Willey	\$ 212.00	
5/1/2021	CC	\$ 63.45	
5/1/2021	CC	\$ 53.80	
5/14/2021	Amex	\$ 7,999.95	GB

6/14/2021	Amex	\$ 6,918.39	GB
7/14/2021	Amex	\$ 5,335.90	GB
8/2/2021	CC	\$ 63.45	
8/13/2021	Verizon	\$ 335.40	
8/16/2021	Amex	\$ 7,892.80	GB
9/14/2021	Amex	\$ 7,208.00	GB
9/13/2021	Verizon	\$ 216.64	
10/1/2021	Verizon	\$ 234.83	
10/1/2021	CC	\$ 63.45	
10/1/2021	CC	\$ 53.80	
11/1/2021	CC	\$ 63.45	
11/1/2021	CC	\$ 53.80	
12/1/2021	CC	\$ 63.45	
12/1/2021	CC	\$ 53.80	
		\$128,632.07	

	Payment to Scott	
	Scott CC payoffs	
1/2/2020	\$ 2,448.29	AF
1/21/2020	\$ 171.04	AF
1/3/2020	\$ 50.00	AF
1/3/2020	\$ 184.59	AF
1/2/2020	\$ 2,801.28	AF
1/2/2020	\$ 2,732.25	AF
1/2/2020	\$ 2,351.89	AF
1/2/2020	\$ 2,344.48	AF
1/2/2020	\$ 1,449.82	AF
1/2/2020	\$ 1,350.78	AF
1/2/2020	\$ 935.04	AF
1/2/2020	\$ 812.42	AF
1/2/2020	\$ 476.37	AF
1/2/2020	\$ 374.45	AF
	\$ 18,482.70	

Paid off with loan from house	12/31/2019	\$ 9,677.00	AMEX
		\$ 4,256.00	Chase
		\$ 3,462.00	chase
		\$ 17,395.00	

Payments made through Venmo or cash to Scott

	Payments to Scott	
	Venmo/Cash	
9/15/2019	\$ 2,500.00	Viking Inv
10/11/2019	\$ 2,500.00	Viking Inv
11/8/2019	\$ 2,500.00	Viking Inv
11/20/2019	\$ 2,500.00	Viking Inv
12/10/2019	\$ 2,500.00	Viking Inv
12/18/2019	\$ 2,500.00	Viking Inv
1/14/2020	\$ 500.00	Venmo
1/2/2020	\$ 3,000.00	AF
2/1/2020	\$ 2,500.00	Venmo
2/6/2020	\$ 450.00	Venmo
2/24/2020	\$ 500.00	Venmo
3/1/2020	\$ 2,500.00	Venmo
3/3/2020	\$ 400.00	Venmo
4/5/2020	\$ 2,200.00	Venmo
4/23/2020	\$ 400.00	Venmo
4/25/2020	\$ 150.00	Venmo
5/25/2020	\$ 400.00	Venmo
6/1/2020	\$ 500.00	Cash
6/25/2020	\$ 150.00	Cash GB
7/25/2020	\$ 400.00	Venmo
7/31/2020	\$ 460.00	cash
8/25/2020	\$ 400.00	Venmo
9/27/2020	\$ 400.00	Venmo
10/12/2020	\$ 200.00	Venmo
12/4/2020	\$ 135.00	Venmo
12/10/2020	\$ 50.00	Venmo
1/14/2021	\$ 140.00	Venmo
12/7/2020	\$ 500.00	Cash GB
1/19/2021	\$ 102.50	Cash GB
2/1/2021	\$ 100.00	Cash GB
3/26/2021	\$ 340.00	Cash GB
4/12/2021	\$ 600.00	Cash GB
6/8/2021	\$ 20.00	Cash GB
7/12/2021	\$ 650.00	Cash GB
5/10/2021	\$ 2,050.00	Venmo
	\$ 35,197.50	

Money into the house.

	Money into house	
\$ 3,509.00	Oven	
\$ 1,900.00	Water system	
\$ 6,041.00	Master Bathroom	
\$ 3,500.00	Fridge	
\$ 1,449.00	Stove top	
\$ 750.00	Hood range	
\$ 7,000.00	Carpet	
\$ 4,212.00	Stone	
\$ 989.00	Slate	
\$ 5,781.00	Laundry room build/Pantry	
\$ 2,004.82	Gate	
\$ 598.00	ADT system	\$69.00 mo
\$ 5,874.96	Air conditioner system	
\$ 1,047.00	Dishwasher	
\$ 3,376.00	Lighting	
\$ 4,300.00	Flooring -sealer and deck stain	
\$ 1,762.50	Wallpaper	
\$ 1,192.13	Beverage fridge	
\$ 5,772.00	Countertop	
\$ 177.00	Weather strip	
\$ 190.00	Doorbell entry light	
\$ 500.00	Fireplace	
\$ 241.00	Glass in fireplace	
\$ 2,800.00	Paint & Grout	
\$ 875.00	Gravel	
\$ 577.25	Backsplash & cabinet handles	
\$ 1,207.00	Custom blinds	
\$ 2,857.22	Master closet	
\$ 1,250.00	Door locks and accessories	
\$ 350.00	Toilets	
\$ 1,600.00	Road Maintenace-required	
\$ 700.00	Scaffolding	
\$ 5,041.00	Electrical/wiring	
\$ 7,728.00	Doors	

\$ 398.27	On demand hot water system	
\$ 225.00	Mail Box	
\$ 4,898.17	plumbing	
\$92,673.32		
	Additional payments	
	Apple	\$ 2,737.25
Mar-21	GP pass	\$ 80.00
		\$ 2,817.25